

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMAN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
SERGIO MARCHIONNE, RICHARD K.
PALMER, and SCOTT KUNSELMAN,

Defendants.

No. 15 Civ. 7199 (JMF)

**DEFENDANTS' NOTICE OF MOTION TO
DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon (i) Defendants' Memorandum In Support of Their Motion To Dismiss the Second Amended Complaint; (ii) the attached Declaration of William B. Monahan, dated April 28, 2016, and the exhibits attached thereto; and (iii) all prior pleadings and proceedings had herein, Defendants Fiat Chrysler Automobiles N.V., Sergio Marchionne, Richard K. Palmer and Scott Kunselman will move this Court, before the Honorable Jesse M. Furman, United States District Judge, in Courtroom 1105, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and time designated by this Court, for an Order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure dismissing the Second Amended Complaint (Docket No. 38) with prejudice.

Dated: April 28, 2016
New York, New York

Respectfully submitted,

/s/ Robert J. Giuffra, Jr.
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